

**Los Angeles Regional Water Quality Control Board**

September 18, 2014

Mr. Rob Rashanian  
Interim City Manager  
City of Oxnard  
300 West Third Street  
Oxnard, CA 93030

Dear Mr. Rashanian:

**2013-14 PRETREATMENT COMPLIANCE INSPECTION OF THE CITY OF OXNARD**

Thank you and your staff for the cooperation during the Pretreatment Compliance Inspection (PCI) conducted by Tetra Tech, Inc. on April 15-17, 2014. The PCI consisted of an interview with Pretreatment Program staff, file reviews, and industrial user site visits. The PCI focused on Pretreatment Program implementation and compliance.

The PCI Report (Report) conducted on April 15-17, 2014, is attached, and it includes several areas of the Pretreatment Program that need to be addressed. The City of Oxnard (City) should review the attached PCI report and submit, no later than October 30, 2014, a response outlining how and when the City will implement, or has implemented, the required changes described in section 10 of the Report.

If you have any questions, please contact me at (213) 620-2083.

Sincerely,



Cris Morris, P.E., Chief  
Municipal Permitting Unit (NPDES)

Enclosure: PCI Report w/o attachments

cc: Russell Norman, State Water Resources Control Board  
Amelia Whitson, USEPA Region 9, Pretreatment Program  
Chuck Durham, Tetra Tech, Inc

# **Pretreatment Compliance Inspection**

## **Summary Report**

**Discharger:** City of Oxnard  
NPDES No. CA0054097  
Ventura County

**Location:** 251 South Hayes Avenue, Oxnard, CA 93003

**Contacts:** Jeremy Grant, Wastewater Environmental Specialist  
Kurt Oberst, Wastewater Environmental Specialist  
John Talmage, Wastewater Environmental Specialist  
Junior Cervantes, Source Control Technician

**Inspection Dates:** April 15–17, 2014

**Inspected By:** Lynn Kurth, Tetra Tech, Inc.



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## **Attachments**

- Attachment A Water Enforcement National Database (WENDB) Data Sheet
- Attachment B Reportable Noncompliance (RNC) Data Sheet
- Attachment C Nondomestic Discharger Information: Raypak, Inc.
- Attachment D Nondomestic Discharger Information: Consolidated Precision Products
- Attachment E Nondomestic Discharger Information: J.M. Smucker Company
- Attachment F Nondomestic Discharger Information: Parker Hannifin Corporation
- Attachment G Nondomestic Discharger Information: Alliance Finishing and Manufacturing
- Attachment H Standard Conditions for all Permits
- Attachment I Nondomestic Discharger Site Visit Data Sheets
- Attachment J Significant Noncompliance Publication for 2013
- Attachment K Sewer Use Ordinance
- Attachment L Local Limits Resolution
- Attachment M Enforcement Response Plan

## 1. Executive Summary

The city of Oxnard's (City's) staff members have a good general grasp of the pretreatment requirements and thorough knowledge of their nondomestic users. The files reviewed were well-organized and information was readily accessible. This pretreatment compliance inspection (PCI or inspection) of the City, however, revealed several deficiencies in the City's pretreatment program. The City has not notified the Los Angeles Regional Water Quality Control Board (Water Board) of the modifications to its sewer use ordinance (SUO). The Consolidated Precision Products (CPP) and Parker Hannifin Corporation permits both contain a local limit for oil and grease, but they do not specify the applicable type of oil and grease. In addition, the CPP permit does not define which total toxic organics (TTOs) apply to each subcategory TTO limit.

There were several deficiencies in the City's documentation procedures for its compliance monitoring (i.e., no chain-of-custody [COC] form, no container type or sample preservation data). The City documentation for calculating CPP's production-based limits was not available in the file for review. Parker Hannifin did not conduct self-monitoring for all parameters of concern in 2013 and the City did not identify this deficiency in the facility's self-monitoring report (SMR). The CAPCO Analytical Services COC form for the SMR for Parker Hannifin does not contain information on sample preservation. J.M. Smucker Company, Parker Hannifin, and CPP failed to notify the City within 24 hours of noticing effluent limit violations and the City did not identify these significant industrial user (SIU) deficiencies. The requirements for slug discharge control plans in the permits were not consistent with the findings in the City inspector checklists. Furthermore, slug discharge control plans were not found for all SIUs that have permit requirements to develop them. The enforcement response plan (ERP) does not specify the enforcement escalation procedure or timeline for enforcing minor violations. The City is not issuing notices of violation (NOVs) for minor violations in the time frame required in its ERP.

## 2. Introduction

Tetra Tech, Inc., on behalf of the Water Board, conducted a PCI of the City on April 15–17, 2014. The last pretreatment compliance audit (PCA or audit) of the City's pretreatment program had been performed in March 2012. This report describes the primary concerns generated by the most recent inspection.

The PCI consisted of three parts: an interview of the City's pretreatment program staff, a review of selected pretreatment program files, and site visits to three permitted dischargers. The interview of the City's staff included a discussion regarding the City's pretreatment program in general, the City's compliance sampling and inspection procedures and their frequency, and enforcement issues. The file review consisted of examining the records of the following five nondomestic dischargers:

- Raypak, Inc. (categorical industrial user [CIU] subject to Title 40 of the *Code of Federal Regulations* [CFR] 433.17)
- Consolidated Precision Products (CIU subject to 40 CFR 464.15(f), 464.25(e), and 464.35(e)(2))
- J.M Smucker Company (noncategorical SIU)
- Parker Hannifin Corporation (noncategorical SIU)

- Alliance Finishing and Manufacturing (zero-discharging CIU subject to 40 CFR 433.17)

The inspector accompanied City staff to visit the following facilities:

- Raypak, Inc. (CIU subject to 40 CFR 433.17)
- J.M Smucker Company (noncategorical SIU)
- Applied Powdercoat (unpermitted, zero-discharging industrial user [IU])

### **3. Description of Pretreatment Program**

The City owns and operates a wastewater treatment plant that treats residential, commercial, and industrial wastewater from the Oxnard and Port Hueneme and parts of Ventura County (the County), serving a population of approximately 220,000. The City's staff manages a pretreatment program that consists of 654 nondomestic dischargers. Thirty-seven of those dischargers are classified and permitted as SIUs, and 12 of the SIUs are CIUs. In addition to the discharging CIUs, the City regulates one zero-discharging CIU (Alliance Finishing and Manufacturing, which is not counted among the SIUs).

The City also regulates and regularly inspects nonsignificant nondomestic dischargers, including 2 ground water remediation sites, 114 discharging auto shops, and 500 food service establishments. The City issues temporary permits to ground water remediation sites and inspects and samples them annually. The auto shops and restaurants are permitted, inspected, and sampled every 2 years. The City does not accept hauled waste at the publicly owned treatment works (POTWs).

Port Hueneme discharges to the City's wastewater treatment plant, and the nondomestic dischargers in this jurisdiction are managed through the City's pretreatment program. Three of the permitted dischargers are SIUs (included in the count above).

#### **3.1 Pharmaceutical Take-Back Efforts**

City staff indicated that the pretreatment program does not directly participate in the City and the County's pharmaceutical take-back programs. The City Council has adopted a "No Drugs Down the Drain" resolution, and the local police department sponsors quarterly pharmaceutical take-back events that accept all types of drugs including narcotics and other controlled substances.

Pharmaceutical waste in effluent can have a detrimental effect on the environmental health of receiving waters. Pharmaceutical take-back events are a simple and effective way of reducing such harmful effects on the environment. It is recommended that the City consider implementing its own pharmaceutical take-back program or participating in City- and County-sponsored activities. If City staff members are unable to participate in these programs, the pretreatment program should consider supporting public outreach activities for residents and dischargers to ensure that they are aware of local opportunities for safe disposal of pharmaceutical products.

#### **3.2 Dental Mercury**

The City does not have a dental mercury control program. The City does not have a mercury limit in its National Pollutant Discharge Elimination System (NPDES) permit. The permit has performance goals related to mercury, and City staff indicated that they have not noticed any problems or trends with mercury concentrations at the POTW. City staff members were unsure

about the number of dental facilities in the City's jurisdiction. It is strongly recommended that the City survey its jurisdiction to identify dental facilities discharging to the POTW and determine what types of best management practices (BMPs) (such as amalgam separators) are being implemented at those facilities.

### **3.3 Industrial Laundries**

The City has one industrial laundry, Mission Linen, in its service area. City staff asked the facility whether it uses nonylphenol ethoxylates, and it does not. If other industrial laundries open in the City's jurisdiction it is recommended that the City determine whether nonylphenol ethoxylates are being used and encourage the facility to participate in the U.S. Environmental Protection Agency's (EPA's) Safer Detergents Stewardship Initiative ([www.epa.gov/dfe/pubs/projects/formlat/sdsi.htm](http://www.epa.gov/dfe/pubs/projects/formlat/sdsi.htm)).

### **3.4 Performance Measures**

City staff reported that there were no sanitary sewer overflows in 2013 due to nondomestic dischargers. All the overflows were caused by roots or other physical intrusions into the collection system. City staff reported that some trunk lines in the collection system are experiencing corrosion due to hydrogen sulfide. Staff suspected the source might have been an SIU and investigated it, but could not isolate the problem to the SIU. The City used an IBRID MX6 "sniffer" and conducted sampling at Santa Clara Waste Water (centralized waste treater, classified as a CIU) and the dissolved hydrogen sulfide levels at the CIU complied with the local limit. Eventually the high hydrogen sulfide levels subsided and the City was unable to determine the source. During 2011, 24 SIUs were in 100 percent compliance with all pretreatment standards and reporting requirements.

## **4. Pretreatment Program Modifications**

The federal pretreatment regulations at 40 CFR 403.18 require the City to notify the Water Board of any modifications it intends to make to its pretreatment program.

The City revised its SUO to address comments from the 2012 PCA and received final City Council approval for and adoption of the revisions in November 2013. The City adopted the optional streamlining rule provision to allow classification of nonsignificant CIUs. The City plans to update its ERP to reflect the changes made to the SUO. The City has not notified the Water Board of the SUO modifications. The City is required to notify the Water Board of substantial modifications as defined at 40 CFR 403.18(b) and receive approval from the Water Board before the implementing the modifications.

The City has a multijurisdictional agreement (MJA) with Port Hueneme from 1986. (The updated 2011 MJA was voided.) The City also has a 2005 MJA with the County regarding the sewer service in El Rio and Nyeland Acres. The City plans to update both MJAs to clarify that the City is responsible for regulating IUs in the area, and that the County would be responsible for implementing the fats, oils, and grease program (for the MJA with the County).

## **5. Local Limits**

The federal pretreatment regulations at 40 CFR 403.5(c) require POTWs to develop and enforce local limits to implement the general and specific prohibitions at 40 CFR 403.5(a) and (b). The



pretreatment regulations also require POTWs to continue to develop these local limits as necessary and effectively enforce the limits.

The City's local limits have not changed since 1999. The City is planning to reevaluate its local limits as required in its June 2013 NPDES permit. The reevaluation will also address upgrades made to the treatment plant. The NPDES permit required the City to reevaluate its local limits within 180 days of reissuance, which would make the local limits evaluation due by January 26, 2014. The City sent a letter to the Water Board on November 21, 2013, requesting an extension of another 180 days until June 2, 2014, and had not heard back from the Water Board at the time of the PCI. During the PCI, the City was in the process of hiring a consultant to conduct the local limits reevaluation and expected to begin in the next few weeks.

The Tetra Tech inspector reminds the City that if the reevaluation results in nonsubstantial modifications, the City must notify the Water Board at least 45 days before implementation as required at 40 CFR 403.18(d). If the reevaluation results in a proposal to relax or remove any local limits (a substantial modification) the City must receive approval from the Water Board before implementing the revised local limits as required at 40 CFR 403.18(c).

## **6. Nondomestic Discharger Characterization**

The federal pretreatment regulations at 40 CFR 403.8(f)(2) require that POTWs develop and implement procedures to identify and locate IUs that might be subject to the local pretreatment program. Those procedures must also include proper categorization of all SIUs as defined at 40 CFR 403.3(v).

The Tetra Tech inspector found the City's procedures for identifying nondomestic to be excellent. The City is divided into quadrants, in which various inspectors are responsible for identifying new and potential dischargers. City staff members also conduct stormwater inspections, helping them identify new nondomestic dischargers. The City's pretreatment staff members work closely with the City's Planning and Development Department, which continually sends plans for new facilities and modifications at existing facilities to be checked for inclusion in the pretreatment program. The City's Business Licensing Department sends all new business license applications to the pretreatment program monthly. The City also reviews the Certified Unified Program Agencies (CUPA) database for industries with certain processes and chemicals that could affect the POTW and meets with CUPA representatives at least biannually. City staff occasionally review water bills and investigate large-volume water users. Finally, City staff members receive referrals from other City staff, such as Code Enforcement Department staff, about potential nondomestic dischargers. City pretreatment staff members attend weekly meetings to assist small businesses with the business license process and to assess whether the business should be regulated under the pretreatment program. City pretreatment staff and Planning and Code Compliance Department staff conduct cross-training about pollution prevention opportunities at SIUs.

The City periodically receives information about new IUs and changes at existing IUs from the Port Hueneme representative. City staff members also conduct periodic field surveys to look out for and identify new nondomestic users. In addition, the City staff members attend monthly meetings, during which they discuss new developments in the area (including Port Hueneme).

During the interview, City staff mentioned that the two naval air bases in Port Hueneme are classified as SIUs and that City staff have no problems accessing the facilities. During the 2012 audit the auditor recommended that the City thoroughly review and inspect all the industrial processes taking place on the naval bases to ensure that the facilities are being properly regulated. The City conducted an investigation in May 2013 and determined that there are no CIUs or industrial dischargers of concern on the bases.

The Tetra Tech inspector inquired about Applied Powdercoat, which Tetra Tech identified via Internet search. City staff indicated that they do not currently regulate the facility under the pretreatment program. City staff have inspected this facility and confirmed that it does not discharge process wastewater to the City. The Tetra Tech and City inspectors visited this facility as part of this PCI (see Section 8.3). Because the City has established precedent of permitting zero-discharging CIUs, the City is required to classify and permit Applied Powdercoat as a zero-discharging CIU subject to 40 CFR 433.17.

## **7. Control Mechanisms**

To ensure compliance with applicable pretreatment standards, the federal pretreatment regulations at 40 CFR 403.8(f)(1)(iii) require POTWs to control the discharges from nondomestic dischargers by using control mechanisms (permits or other similar means). Permits for CIUs must also properly use the combined wastestream formula, properly convert mass-based limits to concentration-based limits, properly apply production-based limits (if applicable), and include a prohibition on dilution as a substitute for treatment.

### **7.1 Oil and Grease Local Limits**

The regulations at 40 CFR 403.8(f)(1)(iii)(B)(iii) require nondomestic discharger permits to include applicable effluent limits. The CPP and Parker Hannifin permits both contain a local limit for oil and grease in their effluent limit tables, but they do not specify the applicable type of oil and grease (e.g., total, which is comprised of the animal and vegetable fraction plus the mineral fraction, animal and vegetable only, or mineral only). The City's local limits resolution lists limits for oil and grease (mineral) and oil and grease (vegetable). The City staff stated that this issue raised during the 2012 PCA is being addressed as the permits are revised. The City is reminded it must apply the appropriate oil and grease limits and revise the facilities' permits accordingly.

### **7.2 Total Toxic Organics Limits and Monitoring**

The permit for CPP does not define which TTOs apply to each subcategory TTO limit. CPP is subject to 40 CFR 464.15(f), 464.25(e), and 464.35(e)(2). Each of these categories has a different set of TTO parameters that are regulated under the TTO limit for that subcategory. The list at 40 CFR 464.11(a)(4) applies to the TTO limit at 40 CFR 464.15(f); 40 CFR 464.21(a)(3) lists TTOs for 464.25(e); 40 CFR 464.31(a)(3) lists TTOs that apply to 464.35(e)(2). The City is required to revise the permit to clearly state the list of applicable TTOs for each TTO categorical standard, and ensure that the CIU is submitting self-monitoring data for all required TTOs.

### **7.3 Application of Most Stringent Limits**

The effluent limits listed in the Raypak permit do not clearly denote that some of the daily maximum local limits are lower than the categorical standards (i.e., TTOs, copper, nickel). All

samples are taken at the same sample point; therefore, both sets of limits apply at this location. The City does, however, have a statement under Special Conditions that the more stringent limits apply. It is recommended that the City more explicitly denote which limits are the most stringent and, therefore, must be applied in compliance assessment.

#### **7.4    *Production-Based Categorical Standards***

The permit for CPP includes categorical standards for production-based limits (pounds of metal poured). To assess compliance, the City checks the CIU's calculations and includes documentation of the analysis in the files. This is commendable; however, it is recommended that, if the production rate does not vary significantly, the City calculate the discharge limits and place the actual discharge limits in the permit. This would be a more efficient means for the City and the CIU to assess compliance with the applicable federal standard.

#### **7.5    *City Contact Information***

There is an incorrect contact name in the Standard Conditions for the City's permits regarding SMR submittal. The City is required to update the permits with current contact information.

#### **7.6    *City Obligations in Permits***

The 2012 PCA report recommended that the City remove from discharger permits any statements that obligate the City to any actions. The permits reviewed still contain statements such as "the City Manager shall..." It is recommended that the City remove these statements from discharger permits because the intent of discharger permits is to outline the facilities' obligations, not the City's.

### **8.    *Compliance Monitoring***

The federal pretreatment regulations at 40 CFR 403.8(f)(2)(v) require that a POTW develop and implement an inspection and monitoring program to determine compliance or noncompliance with applicable pretreatment standards and requirements, independent of information supplied by nondomestic dischargers. Furthermore, 40 CFR 403.8(f)(2)(vii) requires POTWs to investigate instances of noncompliance and enforce the regulations as necessary.

#### **8.1    *Compliance Sampling***

The regulations at 40 CFR 403.8(f)(2)(v) require that all SIUs be sampled at least annually unless the POTW has authorized a CIU to forego sampling a pollutant regulated by federal pretreatment requirements. In such a case, the POTW must sample for the waived pollutant(s) at least once during the nondomestic discharger's permit term [40 CFR 403.8(f)(2)(v)(A)].

Based on the files reviewed, the City's compliance monitoring frequency is adequate. At a minimum, the City conducts semiannual compliance sampling at its SIUs. There were several deficiencies, however, with the City's monitoring documentation.

There is no space to fill in container type information on the Source Control COC form in the J.M. Smucker Company file. The sampling personnel did not indicate on the September 19, 2013, COC for Raypak whether they used a sample preservative. There was no documentation of sampling procedures with the September 17, 2013, compliance monitoring report for Parker

Hannifin. The City is required to document compliance monitoring procedures to demonstrate that all sampling is conducted in accordance with 40 CFR Part 136.

The City documentation for calculating CPPs' production-based limits was not available in the file for review. The City is required to ensure that these calculations are available so that proper calculation and compliance assessment can be verified.

## **8.2 Compliance Inspections**

The regulations at 40 CFR 403.8(f)(2)(v) require that all SIUs be inspected at least annually unless a discharger is subject to the reduced reporting requirements at 40 CFR 403.12(e)(3). In such a case, the POTW must inspect the discharger at least once every 2 years [40 CFR 403.8(f)(2)(v)(C)].

Based on the files reviewed, the City's compliance inspection frequency and documentation procedures are adequate. At a minimum, the City conducts annual compliance inspections at its SIUs. City inspections are thorough and include visits to process, wastewater treatment, and chemical storage areas and include discussions about changes in the process, BMPs, and good housekeeping practices.

## **8.3 Nondomestic Discharger Site Visits Conducted During the Inspection**

The Tetra Tech inspector, along with City inspectors, visited three permitted nondomestic users as part of the PCI. The Tetra Tech inspector noted the following during the nondomestic user site visits:

- *Raypak, Inc.* The City correctly classified and permitted this facility as a CIU subject to the regulations at 40 CFR 433.17. The discharger manufactures heaters for pools, spas, and commercial boilers. The facility cuts metal sheets (laser cut and sheer cut); forms them into the desired shape; cleans and prepares the parts for powder coating; and powder coats, assembles, and ships the units. Raw materials consist of sheet metal (steel and stainless steel), copper tubing, and brass parts. The process wastewater discharged from the facility consists of water used for cleaning and preparing the sheet metal before powder coating. The facility's pretreatment system consists of chemical precipitation, neutralization, settling/clarification, and solids removal by filter press. The entire pretreatment system is inside a berm.

The Tetra Tech inspector observed several barrels of aluminum chloride and sodium hydroxide stored outside the bermed area and recommended that the facility place the barrels inside the berm or in secondary containers.

- *J.M. Smucker Company.* The City correctly classified and permitted this facility as a noncategorical SIU. The facility is a food processor and receives, destems, washes, and packages strawberries from January to July. The facility receives strawberries in crates and washes them in water, then places them in drums for shipment off-site for further processing. Berries that will be frozen are already destemmed when received. Strawberries that will be used for juice are destemmed at the facility. The facility processes 40,000 crates a day during peak production. The wastestream consists of water

used to wash strawberries and equipment; no chemicals are used. The pretreatment system consists of screening, activated sludge treatment, and pH adjustment.

The City inspector asked the facility representative to replace the label that specifies tank content on the ammonia tank with a larger label that can be more readily seen from a distance.

- *Applied Powdercoat.* This facility is not permitted by the City. It is a job shop that powder coats steel and aluminum sheet metal. The facility does not discharge process wastewater to the City and, therefore, does not have a pretreatment system. Water used in the cleaning and preparation process is reused. The rinse water is stored in a 5,000-gallon tank and reused until it is changed out and hauled off-site. The first step of the powder coating process is surface preparation of the metal. This includes solvent wiping, sandblasting, or glass bead blasting, as well as chemical bath treatments. The most common chemical treatments are zinc phosphating for steel parts and chromate conversion for aluminum parts. The second step is applying the powder coatings onto the parts using electrostatic spray guns. The final step is curing in a 400-degree oven, after which the parts are cooled and packaged.

There were no deficiencies observed during the site visit. As noted in Section 6, the City is required to permit this facility as a zero-discharging facility.

#### **8.4 Requesting, Receiving, and Analyzing Reports**

The federal pretreatment regulations at 40 CFR 403.8(f)(2)(iv) require the City to request, receive, and analyze all reports submitted by SIUs. The SIU reports must contain the information required at 40 CFR 403.12. The inspectors remind the City that EPA has, via the pretreatment streamlining provisions, finalized the sampling requirements for all periodic reports required at 40 CFR 403.12(e) and (h). The City is required to ensure that all reports submitted by SIUs comply with the provisions of 40 CFR 403.12.

Parker Hannifin did not conduct self-monitoring for all parameters of concern, and the City did not identify this deficiency. The SIU is required to sample for oil and grease biannually; however, the Tetra Tech inspector found only one oil and grease SMR for 2013. The City is required to ensure that its SIUs are conducting self-monitoring as required in their permits and 40 CFR 403.12(e).

The CAPCO Analytical Services COC for Parker Hannifin's December 2013 SMR does not contain information on sample preservation. The City is required to ensure that its SIUs conduct and document that all self-monitoring has been conducted in accordance with methods at 40 CFR 136.

J.M. Smucker Company, Parker Hannifin, and CPP failed to notify the City within 24 hours of noticing effluent limit violations, as required in their permits and federal pretreatment regulations. J.M. Smucker Company experienced a total suspended solids (TSS) violation on July 24, 2013; Parker Hannifin had several biochemical oxygen demand (BOD) exceedances, and CPP exceeded oil and grease limits on March 19, 2013, and June 27, 2013. The City escalated enforcement in all circumstances, but did not notice the SIUs that had not met the

notification requirements at 40 CFR 403.12(g)(2). The City is required to revise its report reviewing procedures to ensure that it notices and documents when facilities fail to provide the required notifications.

As noted in Section 7.3, the Raypak permit does not explicitly state which limits are most stringent. The Tetra Tech inspector could not verify whether Raypak is using the most stringent limit when assessing and certifying compliance on the SMR summary sheet. Because the City must ensure that the CIU is applying the correct, most stringent limits, it is recommended that the City include applicable limits on its SIU self-monitoring summary sheets submitted by SIUs.

The Tetra Tech inspector noted that the Parker Hannifin self-monitoring summary table does not summarize results of all required parameters. The results for TTO monitoring are not included on the summary page (e.g., January 23, 2014, report). This is the page the authorized representative signs and certifies; therefore, it is recommended that the City ensure that all monitoring results are summarized on the monitoring results table.

The monitoring summary/certification page submitted by Parker Hannifin has a space to check *yes* or *no* to denote whether pretreatment standards are met. There is not an underline space preceding *yes*, so it appears that the representative always checks the *no* space even when effluent limits have not been exceeded. It is recommended that the City ensure that the facility representative is reviewing and certifying the monitoring data correctly, and correctly stating whether the CIU is in compliance.

The permit for CPP allows the CIU the alternate monitoring procedure allowed at 40 CFR 464.03 to conduct oil and grease monitoring in lieu of TTO monitoring. The Tetra Tech inspector noticed that the CIU is conducting monitoring for both sets of parameters and reminded the City that the facility could be allowed to sample for either TTOs or oil and grease, as allowed at 40 CFR 464.03 (e.g., December 27, 2013, report).

### **8.5 Slug Discharge Control Plans**

The federal pretreatment regulations at 40 CFR 403.8(f)(2)(vi) require the City to evaluate each SIU by October 14, 2006, or within a year of its becoming an SIU, to determine whether the SIU needs to develop and implement a slug discharge control plan. A slug discharge is any discharge of a nonroutine, episodic nature, including an accidental spill or noncustomary batch discharge [40 CFR 403.8(f)(2)(vi)]. The SIU is required to immediately notify the POTW of any changes at the SIU's facility that affect the potential for a slug discharge.

The requirements for slug discharge control plans in the permits were not consistent with the findings in the City inspectors' checklists. Furthermore, slug discharge control plans were not found for all SIUs that have permit requirements to develop them. Therefore, it is confusing as to whether slug discharge control plans are actually required. For example, in Part IV, Special Conditions/Requirements, the J.M. Smucker Company, Raypak, and Parker Hannifin permits state that a plan is required. However, the Spill/Slug Loading Checklists for J.M. Smucker Company and Raypak state that the facilities do not have a slug control program. The Tetra Tech inspector did not find the Spill/Slug Loading Checklist for Parker Hannifin. The CPP Spill/Slug Loading Checklist says the CIU has a slug control program, although the permit does not require one. In addition, the Tetra Tech inspector did not find slug discharge control plans in the files for

CPP, Raypak, and Parker Hannifin. The Emergency Spill Response Plan in the J.M. Smucker Company file does not meet all requirements at 40 CFR 403.8(f)(2)(vi)(A)-(D). The City is required to ensure that its permits correctly reflect the City's intent to require slug discharge control plans, that City inspectors' reports are consistent with those requirements, that SIUs develop and implement slug discharge control plans when required, and that the plans meet all requirements at 40 CFR 403.8(f)(2)(vi).

The City is commended for developing and using its Spill/Slug Loading Checklist. It is recommended that the City revise the checklist to include a question about whether the permit requires a slug discharge control plan. This would be a good tool to ensure that the requirements are in the permit, if appropriate, as required at 40 CFR 403.8(f)(1)(iii)(B)(6).

## 9. Enforcement

The federal pretreatment regulations at 40 CFR 403.8(f)(5) require the City to develop and implement an ERP. Such a plan must contain detailed procedures indicating how the City will investigate and respond to instances of IU noncompliance.

As mentioned in the 2012 PCA, the ERP does not specify the enforcement escalation procedure or timeline for enforcing minor violations, although it does so for formal enforcement actions taken in response to other violations. The regulations at 40 CFR 403.8(f)(5)(ii) state that the ERP should "describe the types of escalating enforcement responses the POTW will take in response to all anticipated types of IU violations and the time periods within which responses will take place." The City is required to revise its ERP to include a timeline for enforcement actions taken in response to minor violations.

The City is not issuing its NOV's in a timely manner. NOV's were issued from 1.5 after the permit violation to up to 5 months after the violation. J.M. Smucker Company experienced a single (minor) TSS violation on July 26, 2013, and the NOV was sent September 5, 2013. An NOV was issued to CPP May 21, 2013, for a single (minor) oil and grease violation that occurred March 19, 2013. It is recommended that the City revise its ERP to include a specific time frame for escalating enforcement for violations the City classifies as minor violations. In the meantime, it is strongly recommended that the City let no more than 30 days elapse between becoming aware of a minor permit violation and issuing an enforcement response.

Furthermore, Parker Hannifin experienced numerous BOD violations in 2013 and was placed in significant noncompliance (SNC). This would not constitute a minor violation as defined in the ERP because it is recurring; therefore, formal enforcement action is required, as per the ERP, to be initiated within 10 days. The City issued NOV's in 2013 as follows: for violations occurring during the first half of March, an NOV was issued on May 20; for violations occurring during late March and throughout April, an NOV was issued on June 19; for May violations, an NOV was issued on October 28; and for July violations, an NOV was issued on November 7. The City is required to issue NOV's within 10 days when formal enforcement is initiated as specified in the ERP.

As noted in the 2010 PCI and the 2012 PCA reports, the City's ERP only specifies that it is intended to address violations of SUO requirements. It is still recommended that the City revise

its ERP to broaden the violations that it is intended to address and to include coverage of violations of IU permits and local, state, and federal law.

The City had three SIUs in SNC in 2013. Parker Hannifin and Herzog Wine Cellar were both in SNC for chronic and technical review criteria violations of BOD. Arcturus Manufacturing Corporation was in SNC for pH violations. The City published public notice of these instances of SNC in the *Ventura County Star* on February 10, 2014. At the time of the PCI, Parker Hannifin and Arcturus had returned to compliance; Herzog Wine Cellar, however, is still experiencing BOD violations and the City plans to place the SIU in SNC and publish the SNC notice.

In addition, the City's SUO still does not reference the ERP as the plan that describes the enforcement procedures the City will use to obtain IU compliance. The federal pretreatment regulations at 40 CFR 403.8(f)(5) require that the City have the legal authority to implement its ERP. The City, therefore, is required to ensure that it has the legal authority to implement its ERP in response to all violations.

## **10. Summary of Requirements and Recommendations**

Listed below are the primary requirements and recommendations resulting from the inspection of the City's pretreatment program. See the cited sections of the report for more specific information pertaining to each comment.

### **10.1 Requirements**

1. The City has not notified the Water Board of the modifications to its SUO. The City is required to notify the Water Board of substantial modifications as defined at 40 CFR 403.18(b) and to receive approval before implementing the modifications. For nonsubstantial modifications, the City must notify the Water Board at least 45 days before implementation as required at 40 CFR 403.18(d). (Section 4, Pretreatment Program Modifications)
2. The City does not currently permit Applied Powdercoat as a zero-discharging CIU, although the City has established precedent by permitting other zero-dischargers. The City is required to classify and permit Applied Powdercoat as a zero-discharging CIU subject to 40 CFR 433.17. (Section 6, Nondomestic Discharger Classification)
3. The CPP and Parker Hannifin permits both contain a local limit for oil and grease in their effluent limit tables, but they do not specify the applicable type of oil and grease (e.g., total, which is comprised of the animal and vegetable fraction plus the mineral fraction, animal and vegetable only, or mineral only). The City is required to apply the appropriate oil and grease limits as required at 40 CFR 403.8(f)(1)(iii)(B)(iii) and revise the facilities' permits accordingly. The 2012 pretreatment compliance audit report previously noted that not all zero-dischargers were appropriately permitted. (Section 7.1, Oil and Grease Local Limits)
4. The permit for CPP does not define which TTOs apply to each subcategory TTO limit. CPP is subject to 40 CFR 464.15(f), 464.25(e) and 464.35(e)(2). Each of these categories has a different set of TTOs that comprise the TTO limit for that subcategory. The City is required to revise the permit to clearly state the list of applicable TTOs for each TTO



categorical standard, and ensure that the CIU is submitting self-monitoring data for all required TTOs. (Section 7.2, Total Toxic Organics Limits and Monitoring)

5. There were several deficiencies in documentation procedures for City compliance monitoring. There was no container type information on the Source Control COC form found in the file for J.M. Smucker Company. The sampling staff did not indicate on the COC for Raypak whether they used a sample preservative. There was no COC form for Test America with the September 17, 2013, compliance monitoring report for Parker Hannifin. The City is required to document compliance monitoring procedures to ensure that all sampling is conducted in accordance with 40 CFR Part 136. (Section 8.1, Compliance Sampling)
6. The City documentation for calculating production-based limits to verify whether CPP is complying with its permit limits was not available in the file for review. The City is required to ensure that these calculations are available so that proper calculation and compliance assessment can be verified. (Section 8.1, Compliance Sampling)
7. Parker Hannifin did not conduct self-monitoring for all parameters of concern and the City did not identify this deficiency. The SIU is required to sample for oil and grease biannually; however, the inspector only found one oil and grease SMR for 2013. The City is required to ensure that its SIUs are conducting self-monitoring as required in their permits and 40 CFR 403.12(e). (Section 8.4, Requesting, Receiving, and Analyzing Reports)
8. The CAPCO Analytical Services COC form for the December 2013 SMR for Parker Hannifin does not contain information on sample preservation. The City is required to ensure that its SIUs conduct and document that all self-monitoring has been conducted in accordance with methods at 40 CFR 136. (Section 8.4, Requesting, Receiving, and Analyzing Reports)
9. J.M. Smucker Company, Parker Hannifin, and CPP failed to notify the City within 24 hours of noticing effluent limit violations, as required in their permits and federal pretreatment regulations. The City escalated enforcement in all circumstances, but did not notify the SIUs that they had not met the notification requirements at 40 CFR 403.12(g)(2). The City is required to revise its report reviewing procedures to ensure that it notices and documents when facilities fail to provide the required notifications. (Section 8.4, Requesting, Receiving, and Analyzing Reports)
10. The requirements for slug discharge control plans in the permits were not consistent with the findings in the City inspector checklists. Furthermore, slug discharge control plans were not found for all SIUs that have permit requirements to develop them. The City is required to ensure that its permits correctly reflect the City's intent to require slug discharge control plans, that the inspector's reports are consistent with those requirements, that slug discharge control plans are developed and implemented by SIUs when required, and that the plans meet all requirements at 40 CFR 403.8(f)(2)(vi). (Section 8.5, Slug Discharge Control Plans)

11. The ERP does not specify the enforcement escalation procedure or timeline for enforcement of minor violations, although it does so for formal enforcement actions taken in response to other violations. The regulations at 40 CFR 403.8(f)(5)(ii) state that the ERP should "describe the types of escalating enforcement responses the POTW will take in response to all anticipated types of IU violations and the time periods within which responses will take place." The City is required to revise its ERP to include a timeline for enforcement actions taken in response to minor violations. The 2012 pretreatment compliance audit report previously noted that minor violations were not documented. (Section 9, Enforcement)
12. The City is not issuing NOVs in the time frame required in its ERP. Parker Hannifin experienced numerous BOD violations in 2013 and was placed in SNC. This would not constitute a minor violation as defined in the ERP; therefore, formal enforcement action is to be initiated within 10 days. The City is required to issue NOVs within 10 days when formal enforcement is initiated as specified in the ERP. The 2012 pretreatment compliance audit report previously noted delays in enforcement actions. (Section 9, Enforcement)

## **10.2 Recommendations**

1. It is recommended that the City consider implementing its own pharmaceutical take-back program or participating in City- and County-sponsored activities. If City staff members are unable to participate in these programs, the pretreatment program should consider implementing public outreach activities to residents and dischargers to ensure that they are aware of local opportunities for safe disposal of pharmaceutical products. (Section 3.1, Pharmaceutical Take-Back Efforts)
2. It is strongly recommended that the City survey its jurisdiction to identify dental facilities discharging to the POTW and determine what types of BMPs are being implemented at those facilities. (Section 3.2, Dental Mercury)
3. The City plans to reevaluate its local limits. The Tetra Tech inspector reminds the City that if the reevaluation results in nonsubstantial modifications, the City must notify the Water Board at least 45 days before implementation as required at 40 CFR 403.18(d). If the reevaluation results in a proposal to relax any local limits (substantial modification) the City must receive approval from the Water Board before implementing the revised local limits as required at 40 CFR 403.18(c). (Section 5, Local Limits)
4. The effluent limits listed in the Raypak permit do not clearly denote that some of the daily maximum local limits are lower than the categorical standards (i.e., TTO, copper, nickel). It is recommended that the City more explicitly denote which limits are the most stringent and must be applied in compliance assessment. (Section 7.3, Application of Most Stringent Limits)
5. The permit for CPP includes the categorical standards for production-based limits (pounds of metal poured). The inspector recommends that if the production rate does not vary significantly the City could calculate the discharge limits and place the actual

- discharge limits in the permit. This could be more efficient for the City and the CIU to track. (Section 7.4, Production-Based Categorical Standards)
6. There is an incorrect contact name in the Standard Conditions for the City's permits for SMR submittal. The City is required to update the permits with current contact information. (Section 7.5, City Contact Information)
  7. The inspector recommends that the City remove statements that obligate the City to any actions because intent of discharger permits is to outline the facilities' obligations, not those of the City. (Section 7.6, City Obligations in Permits)
  8. During the site visit at Raypak the Tetra Tech inspector observed several barrels of aluminum chloride and sodium hydroxide stored outside the bermed area and recommended that the facility place the barrels inside the berm or in secondary containers. (Section 8.3, Nondomestic Discharger Site Visits Conducted During the Inspection)
  9. During the site visit at J.M. Smucker Company the City inspector asked the facility representative to replace the label that specifies tank content on the ammonia tank with a larger label that can be more readily seen from a distance. (Section 8.3, Nondomestic Discharger Site Visits Conducted During the Inspection)
  10. The Raypak permit does not explicitly state which limits are most stringent, and the inspector could not verify whether Raypak is using the most stringent limit when assessing and certifying compliance on the SMR summary sheet. Because the City must ensure that the CIU is applying the correct, most stringent limits the inspector recommends that the City include applicable limits on its SIU self-monitoring summary sheets submitted by SIUs. (Section 8.4, Requesting, Receiving, and Analyzing Reports)
  11. The inspector noted that the Parker Hannifin self-monitoring summary table does not summarize results of all required parameters. The results for TTO monitoring are not included on the summary page. This is the page the authorized representative signs and certifies. Therefore, the inspector recommends that the City ensure that all monitoring results are summarized on the monitoring results table. (Section 8.4, Requesting, Receiving, and Analyzing Reports)
  12. The monitoring summary/certification page submitted by Parker Hannifin has a space to check *yes* or *no* to denote whether pretreatment standards are met. The representative always checks the *no* space even when effluent limits have been exceeded. The inspector recommends that the City ensure that the representative is reviewing and certifying the monitoring data correctly, and correctly stating whether the CIU is in compliance. (Section 8.4, Requesting, Receiving, and Analyzing Reports)
  13. The permit for CPP allows the CIU the alternate monitoring procedure allowed at 40 CFR 464.03 to conduct oil and grease monitoring in lieu of TTO monitoring. The inspector noticed that the CIU is conducting monitoring for both sets of parameters and reminded the City that the facility could be allowed to sample for TTOs or oil and grease,

as allowed at 40 CFR 464.03. (Section 8.4, Requesting, Receiving, and Analyzing Reports)

14. The City is not issuing its NOVs in a timely manner. NOVs were issued from 1.5 months after the permit violation to up to 5 months after the violation. It is recommended that the City revise its ERP to include a specific time frame for escalating enforcement for violations the City classifies as minor violations. In the meantime, it is strongly recommended that the City let no more than 30 days elapse between becoming aware of a minor permit violation and issuing an enforcement response. (Section 9, Enforcement)
15. The City's ERP specifies that it is intended to address violations of SUO requirements. Because the City has not revised its ERP, the inspector continues to recommend that the City revise it to broaden the violations that the ERP is intended to address to include violations of IU permits and local, state, and federal law. (Section 9, Enforcement)

## SITE VISIT DATA SHEET

<b>INSTRUCTIONS:</b> Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: Raypak, Inc.					
Address of industry: 2151 Eastman Avenue, Oxnard, CA 93030					
Date of visit: 4/16/2014			Time of visit: 2:00 p.m.		
Name of inspector(s): Lynn Kurth, Tetra Tech, Inc. John Talmage, City of Oxnard					
Provide the name(s) and title(s) of industry representative(s)					
<b>Name</b>		<b>Title</b>		<b>Phone</b>	
Jerry Moore		Safety and Environmental Engineer		805-278-5300	
IU Permit Number: 64517		Exp Date: 6/30/2014		IU Classification: 40 CFR 433	
Inspection	<input checked="" type="checkbox"/>	Scheduled	<input type="checkbox"/>	Unscheduled	<input type="checkbox"/>
Type/Purpose	<input checked="" type="checkbox"/>	PCI	<input type="checkbox"/>	New Company	<input type="checkbox"/>
Please provide the following documentation:					
1. Nature of operation: The discharger manufactures heaters for pools and spas and commercial boilers.					
2. Number of employees	350 – 160 office 190 factory	Number of shifts:	2 shifts M–Th four, 10-hour days	Hours of operation:	6:00 a.m.- 1:30 am.
3. Water source: City of Oxnard					
4. Wastestream flow(s) discharged to the POTW: The process wastestream discharged from the facility consists of water used for cleaning and preparing the sheet metal before powder coating.  There are two drains in the parts cleaning process area. The drains capture the drag-out from the last rinse tank. These drains do not discharge directly to the City. This wastewater is sent to the pretreatment system and treated with the wastewater generated in the process cleaning system.					
Sanitary:	(gpd)	Process:	10,000 approx (gpd)	Combined:	(gpd)
5. Describe any significant changes in process or flow: The facility is researching coolant recycling machines to reduce the wastestream and coolant usage.					

### SITE VISIT DATA SHEET (Continued)

6. Type of pretreatment system (Describe): The facility's pretreatment system consists of chemical precipitation, neutralization, settling/clarification, and solids removal by filter press. The entire pretreatment system is inside a berm.		
<input checked="" type="checkbox"/> Continuous flow	<input type="checkbox"/> Batch	<input type="checkbox"/> Combined
7. Condition/operation of pretreatment system (Describe): Good.		
Any unusual conditions or problems with the pretreatment system: No.		
8. Process area description (Identify raw materials and processes used.): The facility cuts metal sheets (laser cut and sheer cut), forms them into shapes; cleans and prepares the parts for powder coating; and powder coats, assembles, and ships the units. Raw materials consist of sheet metal (steel and stainless steel), copper tubing, and brass parts.  The facility manufactures approximately 300 pool/spa heating units a day and about 20 commercial boiler units a day.		
9. Condition/operation of process area (Describe): Good.		
Any unusual conditions or problems with the process area: No.		
10. General housekeeping in process area (Describe): Good.		
Any unusual conditions or problems with general housekeeping in process area: No.		
11. Chemical storage area (Identify the chemicals that are maintained on-site and how they are stored.): The facility powder coating materials, lubrication oils, parts cleaners (e.g., potassium hydroxide), and pretreatment system chemicals.		

**SITE VISIT DATA SHEET (Continued)**

Any floor drains?	Yes. Trenches that flow to pretreatment system.	Any spill control measures?	Yes.
General housekeeping of chemical storage area (Describe): Good.			
12. Are hazardous wastes drummed and labeled? Yes. Waste oil used for fork lifts and hydraulic oil from the filter press and waste coolant are stored outside in a locked cage with secondary containment. Asbury Environmental hauls off waste coolant and Black Gold hauls off waste oil. The filter cake is not regulated as hazardous waste. In a letter dated May 19, 2010, the City of Oxnard Fire CUPA concluded that the filter cake does not exhibit corrosivity or toxicity characteristics of hazardous waste.			
13. Does the IU have hazardous waste manifests? Yes.			
Any problems associated with hazardous waste: No.			
14. Solid waste production: Filter cake.			
Solid waste disposal method(s): Disposed of as garbage.			
15. Description of sample location: Sample location is outside of the building on the Lombard Street side.			
Sampling method/technique: Composites/grabs.			
16. Evaluation of self-monitoring data:		Yes	X No
If yes, was self-monitoring adequate: Data not reviewed at the facility.			
17. Who performs the self-monitoring analysis? PatChem.			
Notes:			
The Tetra Tech inspector observed several barrels of aluminum chloride and sodium hydroxide stored outside the bermed area and recommended that the facility place them inside the berm or in secondary containers.			

## SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: J.M. Smucker Company					
Address of industry: 800 Commercial Avenue, CA 93030					
Date of visit: 4/16/2014			Time of visit: 1:40 p.m.		
Name of inspector(s): Lynn Kurth, Tetra Tech, Inc. John Talmage, City of Oxnard					
Provide the name(s) and title(s) of industry representative(s)					
<b>Name</b>		<b>Title</b>		<b>Phone/Email</b>	
Jonathan LeFevre		Quality Assurance Manager		805-487-5483	
IU Permit Number: 88262      Exp Date: 6/30/2014      IU Classification: Noncategorical SIU					
Inspection	<input checked="" type="checkbox"/>	Scheduled	<input type="checkbox"/>	Unscheduled	<input type="checkbox"/>
Type/Purpose	<input checked="" type="checkbox"/>	PCI	<input type="checkbox"/>	New Company	<input type="checkbox"/>
PCA Complaint					
Please provide the following documentation:					
1. Nature of operation: The facility is a food processor and receives, destems, washes, and packages strawberries from January to July.					
2. Number of employees	250	Number of shifts:	Two, 10-hour shifts 6 days a week	Hours of operation:	24 hours with a 4-hour sanitation shift
3. Water source: City of Oxnard					
4. Wastestream flow(s) discharged to the POTW: The wastestream consists of water used to wash strawberries and equipment.					
Sanitary:		(gpd)	Process:	148,000 gpd	Combined: (gpd)
5. Describe any significant changes in process or flow: Production was slower, which is likely because Easter was later in the year. (Chocolate-covered strawberries have a high sell rate at Easter time.) Tree Top Juice was co-located but left 2 years ago and the wastewater discharge decreased slightly (about 5 percent).					



### SITE VISIT DATA SHEET (Continued)

6. Type of pretreatment system (Describe): The pretreatment system consists of screening, activated sludge treatment, and pH adjustment.			
X	Continuous flow		Batch
			Combined
7. Condition/operation of pretreatment system (Describe): Good.			
Any unusual conditions or problems with the pretreatment system: No.			
8. Process area description (identify raw materials and processes used): During the season the facility receives strawberries in crates, washes them in water, and then places them in drums for shipment off-site for further processing. Berries that will be frozen are already destemmed when received. Strawberries that will be used for juice are destemmed at the facility. The facility processes 40,000 crates a day during peak production.			
9. Condition/operation of process area (Describe): Good.			
Any unusual conditions or problems with the process area: No.			
10. General housekeeping in process area (Describe): Good.			
Any unusual conditions or problems with general housekeeping in process area: No.			
11. Chemical storage area (Identify the chemicals that are maintained on-site and how they are stored.): Chemicals maintained on-site are stored appropriately and consist of caustic soda, ammonia, phosphoric acid, antifoam agent, and sodium hypochlorite.			

**SITE VISIT DATA SHEET (Continued)**

Any floor drains?	Yes – trenches drain to pretreatment. Perimeter berm.	Any spill control measures?	Yes.
General housekeeping of chemical storage area (Describe): Good.			
12. Are hazardous wastes drummed and labeled? Yes.			
13. Does the IU have hazardous waste manifests? Yes. Safety Clean hauls used oil and hydraulic fluid for equipment off-site.			
Any problems associated with hazardous waste: No.			
14. Solid waste production: Stems and wasted strawberries.			
Solid waste disposal method(s): Hauled off for cattle feed by H&H Cattle.			
15. Description of sample location: Sample is taken at the pretreatment unit monitoring tank.			
Sampling method/technique: Grabs/composites.			
16. Evaluation of self-monitoring data:		Yes	x No
If yes, was self-monitoring adequate: Data not reviewed at facility.			
17. Who performs the self-monitoring analysis? FGL Analytical.			
Notes:			
The City inspector asked the facility representative to replace the label that specifies tank content on the ammonia tank with a larger label that can be more readily seen from a distance.			

## SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.					
Name of industry: Applied Powdercoat					
Address of industry: 3101 Camino Del Sol, Oxnard, CA 93030					
Date of visit: 4/16/2014			Time of visit: 2:50 p.m.		
Name of inspector(s): Lynn Kurth, Tetra Tech, Inc. John Talmage, City of Oxnard					
Provide the name(s) and title(s) of industry representative(s)					
<b>Name</b>		<b>Title</b>		<b>Phone</b>	
Anthony Martinez		Quality Assurance		805-981-1991	
IU Permit Number: None					
Exp Date: NA		IU Classification: Not currently classified			
Inspection	<input checked="" type="checkbox"/>	Scheduled	<input type="checkbox"/>	Unscheduled	<input type="checkbox"/>
Type/Purpose	<input checked="" type="checkbox"/>	PCI	<input type="checkbox"/>	New Company	<input type="checkbox"/>
Please provide the following documentation:					
1. Nature of operation: The facility is a job shop that powder coats steel and aluminum sheet metal.					
2. Number of employees	53	Number of shifts:	2	Hours of operation:	5:00 a.m.– 10:30 p.m.
3. Water source: City of Oxnard					
4. Wastestream flow(s) discharged to the POTW: The facility does not discharge process wastewater to the City. Water used in the rinsing process when the sheet metal is cleaned before powder coating is reused. This rinse water is stored in a 5,000-gallon tank and reused until it is changed out and hauled off-site by South Carolina Environmental Services.					
Sanitary:	(gpd)	Process:	(gpd)	Combined:	(gpd)
5. Describe any significant changes in process or flow: None.					

### SITE VISIT DATA SHEET (Continued)

6. Type of pretreatment system (Describe): The facility does not have a pretreatment system because it does not discharge process wastewater.			
X	Continuous flow		Batch
			Combined
7. Condition/operation of pretreatment system (Describe): NA.			
Any unusual conditions or problems with the pretreatment system: NA.			
8. Process area description (Identify raw materials and processes used.): The first step of the powder coating process is surface preparation of the metal parts to be coated. This includes solvent wiping, sandblasting or glass bead blasting, and chemical bath treatments. The most common chemical treatments are zinc phosphating for steel parts and chromate conversion for aluminum parts. The second step is applying the powder coatings onto the parts using electrostatic spray guns. The final step is curing in a 400-degree oven, and then the parts are cooled and packaged.			
9. Condition/operation of process area (Describe): Good.			
Any unusual conditions or problems with the process area: No.			
10. General housekeeping in process area (Describe): Good.			
Any unusual conditions or problems with general housekeeping in process area: No.			
11. Chemical storage area (Identify the chemicals that are maintained on-site and how they are stored.): The facility stores paint, alcohol and cleaning products properly in secondary containment.			

**SITE VISIT DATA SHEET (Continued)**

Any floor drains?	No.	Any spill control measures?	NA
General housekeeping of chemical storage area (Describe): Good.			
12. Are hazardous wastes drummed and labeled? No hazardous waste is produced. The rinse water is hauled off-site as nonhazardous waste by South Carolina Environmental Services.			
13. Does the IU have hazardous waste manifests? Not applicable (NA).			
Any problems associated with hazardous waste: NA.			
14. Solid waste production: NA.			
Solid waste disposal method(s): NA.			
15. Description of sample location: NA.			
Sampling method/technique: NA.			
16. Evaluation of self-monitoring data:		Yes	No
			X
If yes, was self-monitoring adequate: NA			
17. Who performs the self-monitoring analysis? NA			
Notes:			
There were no deficiencies observed during the site visit; however, the inspector recommends that the City permit this facility as a zero-discharging CIU.			